

Application No. 10/825,897
Attorney Docket Number 2102393-991180

REMARKS/ARGUMENTS

The Examiner indicated that claims 11-14, 25-28 and 34-37 were allowable, and rejected claims 1-10, 15-24 and 29-33 under 35 U.S.C. §102(e), as being anticipated by U.S. Patent No. 6,556,739 of Kruglick ("Kruglick"). Applicants have amended independent claims 1, 15 and 29 to include a limitation that is contained in dependent claims 8, 22 and 31, respectively, and that is not disclosed in Kruglick. Thus, Applicants respectfully assert that all claims are now allowable in their present form.

B. §102 rejections

Independent claims 1, 15 and 29 have been amended to further clarify the unique feature of Applicants' invention which provides feed forward signals to certain *non-moving* elements to minimize the disturbance caused by moving elements (claims 1 and 29), or which provides signals to *non-switched mirrors* to minimize the disturbance caused by switched mirrors (claim 15). The related limitations were contained in dependent claims 8, 22 and 31, respectively, which were accordingly canceled.

Applicants' unique system and method provides control to non-moving members to cancel or resist disturbance caused by other members, i.e., moving members.¹ This system and method is fundamentally different from the system described in Kruglick. Particularly, Kruglick is not concerned with controlling disturbance in non-moving or non-switched members. Rather, Kruglick controls the actuation of a moving or switched member to minimize the oscillation or disturbance *in that same member*. Kruglick focuses on "minimizing the settlement time of the actuator plate 204 in order to reduce the switching time." (Kruglick, 5:50-58). As such, Kruglick provides control of the "actuation signals" used to move each micromirror, rather than control signals sent to members that are not moving, as in the claimed invention. Kruglick describes the actuation signals as follows:

¹ Or in the case of claim 15, provides control to non-switched mirrors to cancel or resist disturbance caused by switched mirrors.

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The actuation signal 240 provides highly effective damping because it reduces the magnitude of bouncing off of the motion stop 208 and reduces the length of time that actuator plate bounces off of the motion stop 208. These features reduce the settling time of the actuator plate 204. In this way, the actuation signal 240 provides electronic damping of the actuator plate 204. (Kruglick, 6:12-18).

Kruglick is only concerned with actuation signals used to move or switch mirrors, and does not disclose any system or method that provides signals to non-moving elements or mirrors to cancel disturbances caused by the moving mirrors.

Control using a feed forward signal that is sent to non-moving elements (or mirrors) to cancel disturbance caused by moving elements (or mirrors) is not disclosed or suggested in Kruglick. For at least these reasons, Kruglick cannot anticipate independent claims 1, 15 and 29 or any claims depending from those claims, i.e., claims 2-7, 9-14, 16-21, 23-28, 30 and 32-37.

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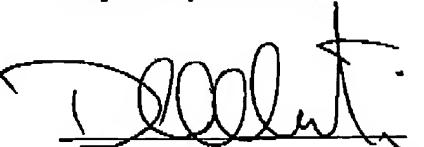
CONCLUSIONS

In summary, Applicants' invention is both novel and nonobvious over the prior art for the reasons set forth above. None of the prior art of record, teaches each and every element of Applicants' claimed inventions.

For all of these reasons, Applicants respectfully assert that all pending claims 1-7, 9-21, 23-30, and 32-37 are in condition for allowance. The Examiner's early reconsideration is respectfully requested. If the Examiner has any questions, the Examiner is invited to contact Applicants' attorney at the following address or telephone number:

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Respectfully submitted,



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